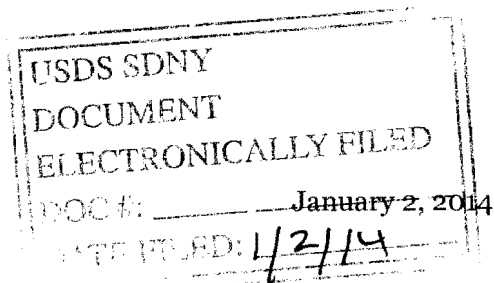


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MEMO ENDORSED

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**VIA FACSIMILE**

The Hon. James C. Francis  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

RE: Chen-Oster, et al. v. Goldman, Sachs & Co., et al.  
No. 10 Civ. 6950 (AT) (JCF)

Dear Judge Francis:

Plaintiffs in the above-referenced matter request permission to file a letter and associated exhibits under seal pursuant Your Honor's Standing Orders of September 3, 2013, and pursuant to the Protective Order and Confidentiality Agreement so ordered by the Court on March 18, 2011, Docket No. 51 ("Protective Order").

The letter requests a pre-motion conference seeking resolution of a dispute between the parties concerning the delayed production of documents from custodians whose files are subject to an electronic search protocol. Defendants have designated certain exhibits, portions of which are cited in the letter, as Confidential - Attorneys' Eyes Only. Plaintiffs have advised Goldman Sachs that they object to these designations. The designations clearly fall short of the standard set forth in the Protective Order, which pertains to "non-public commercially sensitive, proprietary or trade secret matter of or regarding the party, including sensitive customer information and/or private employee information identifiable in connection with particular individuals (e.g., social security numbers, compensation, personal contact information)." *Id.*

The Hon. James C. Francis  
January 2, 2014  
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In abundance of caution, Plaintiffs preliminarily submit the letter and associated exhibits under seal, until the Court is able to determine whether a sealing order is warranted.

Very truly yours,



Lisa Cisneros

cc: Theodore O. Rogers, Jr., Esq. (Via E-Mail)  
Barbara B. Brown, Esq. (Via E-Mail)  
Adam T. Klein, Esq. (Via E-Mail)  
Kelly M. Dermody (Via E-Mail)

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1/2/14  
Application granted.  
SO ORDERED.  
James C. Francis IV  
VSMJ